



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF AIR POLLUTION CONTROL  
William R. Snodgrass Tennessee Tower, 15<sup>th</sup> Floor  
312 Rosa L. Parks Avenue  
Nashville, TN 37243  
(615) 532-0554 Voice or (615) 532-0614 FAX

**Certified Article Number**

9414 7266 9904 2154 5140 70

**SENDER'S RECORD**

January 29, 2020

Mr. Stephen Scott, President  
Volunteer Environmental Services, LLC  
549 East Pass Road, STE F  
Gulfport, MS 39507

Re: Construction Permit Application  
Covington Waste Water Treatment Plant  
298 Witherington Drive, Covington, TN 38019  
Emission Source Reference No. 84-0124-01/Permit No. 977924

Dear Mr. Scott:

Your construction permit application dated January 13, 2020, for modification to the feedstock for the existing gasifier unit was received on January 14, 2020. Please be advised that construction or modification of the source cannot begin until you are in receipt of the issued construction/modification permit. A determination has been made that the application is incomplete for the following reason(s):

Additional information is needed as follows:

1. An updated list of all proposed feedstocks
2. An applicability analysis review of potentially-applicable National Emission Standards for Hazardous Air Pollutants (NESHAP), found at 40 CFR Part 63, and New Source Performance Standards (NSPS), found at 40 CFR Part 60, for all proposed feedstocks
3. Emission estimates/calculations for each proposed feedstock
4. A description of the origin and handling of each proposed feedstock that will be processed
5. A description of handling and storage/disposal of biochar produced by the gasifier
6. A flow diagram that illustrates the movement of feedstock material and biochar throughout the facility

The responsible official for an air contaminant source is required by paragraph 1200-03-26-.02(5) of the Tennessee Air Pollution Control Regulations to pay a construction permit application filing/processing fee. Based on the information provided in your application, the fee for your submittal is \$50.00. Please pay your fee by check payable to the Tennessee Division of Air Pollution Control and send to the following:

Tennessee Department of Environment and Conservation  
Division of Air Pollution Control  
William R. Snodgrass Tennessee Tower, 15th Floor  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

The fee and a copy of this letter must be submitted within 60 days of receipt of this letter so that the Division can process your application. If additional deficiencies are later identified, you will be able to correct them within the remainder of the 180-day period that begins on the date you received this letter, as provided in subparagraph 1200-03-26-.02(4)(d) of the Tennessee Air Pollution Control Regulations.

Please submit the additional information to the Technical Secretary at the address above or email the information to Air.Pollution.Control@TN.gov in Adobe pdf format within 60 days of receipt of this letter so that the Division can review the revised application for completeness. If additional deficiencies are identified, you will be able to correct them within the remainder of the 180-day period that begins on the date you received this letter, as provided in subparagraph 1200-03-26-.02(4)(d) of the Tennessee Air Pollution Control Regulations.

It is the express intent of the Tennessee Air Pollution Control Board that the 180-day permit application correction period is not to be construed by an applicant as permission to construct or modify a source without the permit required by Division Rules. If you fail to submit a complete application within this 180-day time period, all construction permits shall be denied and any fees forfeited.

If you have any questions concerning this correspondence, please contact Mr. Justin Dolzen at 615-532-0575 or Justin.Dolzen@tn.gov. Your Facility ID is **84-0124**, please reference this number in any further correspondence with the Division.

Sincerely,



James P. Johnston, P.E.  
Deputy Director  
Permitting & Regulatory Development